



89.9 FM - Madison, WI

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Independent Sponsored Community Radio Since 1975

July 28th, 1999
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Federal Communications Commission
Washington, D.C. 20554

Re: MM Docket No. 99-25

To Whom It May Concern:

Low Power FM radio as envisioned by FCC Chairman William Kennard is an excellent idea. Deregulation of station ownership has allowed narrowing circle of corporations to dominate the airwaves. As Chairman Kennard noted, "We all know that as more and more stations become concentrated in fewer and fewer hands, there are fewer opportunities for people who want to use the airwaves to speak to their communities."

Many towns and cities in the more sparsely populated regions of the United States have no FM radio services whatsoever. The remoteness and economics of scale do not make even Class C stations feasible. In these areas the need for LPFM licenses is self evident. The spectrum is vacant. Let somebody use it.

Many markets can absorb LPFM licensees with no signal degradation to existing licensees. A license class that allows for small stations in these areas faces limited, and easily solved, technical challenges.

In the early days of radio stations were routinely owned by everything from hardware stores to hotels. Hardy, enterprising Americans ran stations from every conceivable location. The investment was minimal, and access was easy. Radio technology has evolved to the point where anyone can assemble the components to put a clean LPFM signal on the air. The investment is minimal but legal access does not exist. The current licensing classes combined with the free for all nature of the market have raised the bar too high. Access to the airwaves is now limited to those who own them.

The key issues in establishing a new LPFM license class are ownership and format. WORT-FM wholeheartedly supports Chairman Kennard's vision of people using the airwaves to speak to their communities. To ensure equitable access to the airwaves at the community level, ownership of LPFM licenses should be strictly limited to local businesses, local organizations, local

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A Community Shares of Wisconsin organization

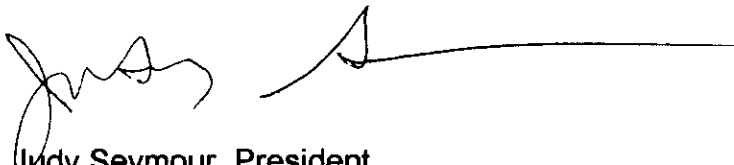


communities, local people. Responsible engineering plans and systems should be required, as well as type accepted equipment to assure against the possibility of interference with other stations.

In addition, in any new LPFM service, satellite program content should be severely limited. Programming that is not of local origination should be severely limited. Formats should be locally driven, with an emphasis on community service.

LPFM licensing is a powerful idea whose time has come. If the FCC moves to establish a low power FM service, it must take steps to ensure that LPFM remains a small scale, locally based service. Any attempt to establish an LPFM service without these protections will lead straight back to "more and more stations concentrated in fewer and fewer hands." LPFM can be a wonderful service that restores democracy and affordable free enterprise back to the airwaves. Please proceed carefully but, by all means, proceed.

Sincerely,

A handwritten signature in black ink, appearing to read 'Judy Seymour', followed by a long horizontal line extending to the right.

Judy Seymour, President
for the WORT-FM Board of Directors